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VIA ECF and Facsimile

The Honorable Naomi Reice Buchwald
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

RE: *In re LIBOR-Based Financial Instruments Antitrust Litig.*,
Case No. 11-md-2262 (S.D.N.Y.);
*Federal Deposit Insurance Corporation as Receiver for 38 Closed Banks v. Bank
of America Corporation, et al.*, Case No. 14-cv-01757 (S.D.N.Y.)
*Federal Deposit Insurance Corporation as Receiver for Doral Bank v. Bank of
America Corporation, et al.*, Case No. 18-cv-01540 (S.D.N.Y.)

Dear Judge Buchwald:

I write on behalf of the Federal Deposit Insurance Corporation as Receiver for 39 Closed Banks (collectively, "FDIC-R") in the above-referenced matters to request that the Court authorize the sealed filing of certain portions of the FDIC-R's Second Amended Complaint filed on April 16, 2019.

The proposed sealed filing contains references to and excerpts from transcripts of testimony from certain criminal trial proceedings in the United Kingdom, the publication of which this Court has previously restricted to comply with the limitations on public use of the transcripts imposed by the Southwark Crown Court.¹ See Order dated September 25, 2015, ECF No. 1206; Order dated January 12, 2016, ECF No. 1292. The proposed sealed filing also contains information designated by one or more Defendants as Confidential or Highly Confidential. See Am. Stipulation and Protective Order, ECF No. 1405 ¶ 2.3.1.

Accordingly, we respectfully request that the Court allow the information to be filed under seal. Attached is a courtesy copy of a Proposed Sealing Order.

We appreciate Your Honor's consideration in this matter.

Respectfully,

/s/ James R. Martin

James R. Martin

*Counsel for Plaintiffs FDIC as Receiver for 38 Closed Banks and
FDIC as Receiver for Doral Bank*

¹ These cases include *In the Southwark Crown Court v. Tom Hayes*, Case No. T20 I 37308, *In the Southwark Crown Court v. Read, et al.*, Case Nos. T20147566, T20137369, T20137370, T20147183, and *In the Southwark Crown Court v. Contogoulas*, Nos. T20147114, T20147116 and T20147239.